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 FOLLOWING PAGE]

Attorneys for PROPOSED-INTERVENORS
 WESTERN ENERGY ALLIANCE and
 INDEPENDENT PETROLEUM
 ASSOCIATION OF AMERICA

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

STATE OF CALIFORNIA, by and through
 XAVIER BECERRA, ATTORNEY
 GENERAL; and the CALIFORNIA AIR
 RESOURCES BOARD; and STATE OF
 NEW MEXICO, by and through HECTOR
 BALDERAS, ATTORNEY GENERAL,

Plaintiffs,

v.

RYAN ZINKE, Secretary of the Interior;
 JOSEPH R. BALASH, Assistant Secretary for
 Land and Minerals Management, United States
 Department of the Interior; UNITED STATES
 BUREAU OF LAND MANAGEMENT; and
 UNITED STATES DEPARTMENT OF THE
 INTERIOR,

Defendants.

Case No. 4:18-cv-05712-DMR

**PROPOSED-INTERVENORS WESTERN
 ENERGY ALLIANCE'S AND
 INDEPENDENT PETROLEUM
 ASSOCIATION OF AMERICA'S SECOND
AMENDED NOTICE OF MOTION TO
INTERVENE**

REQUESTED Hearing Date: November 8, 2018
 REQUESTED Hearing Time: 11:00 a.m.
 Courtroom: 4, 3rd Floor

[The Hon. Magistrate Donna M. Ryu]

Trial Date: None Set

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SECOND AMENDED NOTICE OF MOTION AND MOTION TO INTERVENE**TO THE COURT, AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:****PLEASE TAKE NOTICE THAT** pursuant to the Clerk's Notice (Dkt. No.'s 8 & 11),

Western Energy Alliance (Alliance) and the Independent Petroleum Association of America (IPAA) (collectively, the "Proposed-Intervenors"), file this Second Amended Notice that on November 8, 2018 at 11:00 a.m. in Courtroom 4, 3rd Floor, Oakland Courthouse, 1301 Clay Street, Oakland, California 94612 of the above-titled Court, Proposed-Intervenors will and hereby do move this Court for an Order granting the Proposed-Intervenors' Motion to Intervene in the above-titled action. Also pursuant to the Clerk's Notice (Dkt. No.'s 8 & 11), Proposed-Intervenor's Motion (Dkt. 5) is not being re-filed with this Second Amended Notice, and the briefing schedule for the Motion remains in effect.

The Motion to Intervene is made pursuant to Federal Rule of Civil Procedure 24 because the Proposed-Intervenors have an interest in this action that will not be adequately represented by the named Defendants, and this interest is sufficient to warrant intervention as a matter of right under Rule 24(a), or, alternatively, by permissive intervention under Rule 24(b).

The Motion to Intervene is based on this Notice; the following Memorandum of Points and Authorities; the Declaration of Kathleen Sgamma and the [Proposed] Order filed concurrently herewith; all pleadings and papers filed in this action; and such oral argument and other evidence properly presented to the Court at a hearing on the Motion.

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1 DATED: September 27, 2018

HOLLAND & HART LLP

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By: /s/ Eric P. Waeckerlin

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ERIC P. WAECKERLIN (*Pro Hac Vice Pending*)
Attorneys for PROPOSED-INTERVENORS
WESTERN ENERGY ALLIANCE and the
INDEPENDENT PETROLEUM ASSOCIATION OF
AMERICA

8 DATED: September 27, 2018

DAVIS GRAHAM & STUBBS LLP

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By: /s/ Kathleen C. Schroder

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KATHLEEN C. SCHRODER (*Pro Hac Vice Pending*)
Attorneys for PROPOSED-INTERVENORS
WESTERN ENERGY ALLIANCE and the
INDEPENDENT PETROLEUM ASSOCIATION OF
AMERICA

15 DATED: September 27, 2018

WOOD, SMITH, HENNING & BERMAN LLP

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By: /s/ Emil A. Macasinag

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EMIL A. MACASINAG
Attorneys for PROPOSED-INTERVENORS
WESTERN ENERGY ALLIANCE and the
INDEPENDENT PETROLEUM ASSOCIATION OF
AMERICA

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PROOF OF SERVICE

I am Local Counsel for Proposed Intervenor. I am over the age of eighteen years and not a party to the within action. My business address is 10960 Wilshire Boulevard, 18th Floor, Los Angeles, CA 90024-3804.

On September 27, 2018, I served the following document(s) described as **PROPOSED-INTERVENORS WESTERN ENERGY ALLIANCE'S AND INDEPENDENT PETROLEUM ASSOCIATION OF AMERICA'S SECOND AMENDED NOTICE OF MOTION TO INTERVENE** on the interested parties in this action as follows:

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 27, 2018, at Los Angeles, California.

/s/ Adriana C. Moreno
Adriana C. Moreno

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